

Generic Quality Assurance Project Plan For Superfund Integrated Site Assessment Activities

November 1998

by Paul E. Doherty/Shirley Williams

Superfund Division
USEPA Region VII
Kansas City, Kansas

APPROVED:

Cecilia Tapia, Manager
Site Assessment and Cost Recovery Branch

Date: _____

Robert Jackson, Manager
Emergency Response and Removal Recovery Branch

Date: _____

Ken Buchholz, Manager
Emergency and Fund-Lead Removal Branch

Date: _____

Ernest L. Arnold, Regional Quality Assurance Officer

Date: _____

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Attachment A: Region VII Superfund Site Screening Form

Attachment B: Site Addendum for the Generic Integrated Site Assessment QAPP

Attachment C: EPA R7 Screening Table

Attachment D: Contract Laboratory Program Target Analyte List

1 PROJECT MANAGEMENT

1.3 Distribution List

Copies of the approved Generic Quality Assurance Project Plan (QAPP) for Integrated Site Assessment Activities will be distributed to the following individuals:

EPA Region VII:	Cecilia Tapia, Manager, SACR Bob Jackson, Manager, ER&R Ken Buchholz, Manager, EFLR Bob Dona, SUPR QA Coordinator Paul Doherty, SUPR Site Assessment Coordinator SAMs/OSCs who perform site assessments Ernie Arnold, QAO
Contractor:	Program Manager QA Officer (Contractor will distribute copies within their organization)

1.4 Project Organization

Integrated Site Assessment (ISA) activities are currently being conducted by Site Assessment Managers, (SAMs) and On-Scene Coordinators (OSCs) located within the Enforcement/Fund-lead Removal Branch (EFLR) and the Emergency Response and Removal Branch (ER&R) of the Superfund Division. Figure 1 shows the organizational structure of the ISA program for the Superfund Division and the Superfund Technical Assessment and Response Team (START) Contract, one of the contracts used for ISAs. The structure for ISA activities performed by another Superfund support contractor would vary according to the support contract's organization.

1.4.1 Key Personnel

An EPA project manager (e.g., Site Assessment Manager [SAM], On-Scene Coordinator [OSC], Site Investigation Officer [SIO], Remedial Project Manager [RPM], or other EPA personnel) will serve as the project manager for the ISA. The EPA project manager will oversee all elements associated with the project and will coordinate field activities and other site-related operations with the contractor project manager. The *Site Addendum for the Generic Integrated Site Assessment QAPP* (Attachment B) shall be reviewed by the Superfund Division's Quality Assurance Coordinator (QAC) prior to the start of field work.

The contractor's project manager will be responsible for gathering pertinent background information pertaining to the site, obtaining equipment necessary to implement field work, acquiring non-sampling data required to complete the investigation, arranging site access, planning and implementing all field activities, preparing trip reports upon completion of field activities, and preparing the ISA report. The contractor's project manager will ensure that acquisition of non-sampling data and sampling-related information will be thoroughly documented (i.e., in logbooks, telephone conversation records, sample field sheets, etc.), in accordance with EPA Region VII SOPs and/or Contractor SOPs.

EPA Region VII Environmental Services (ENSV) Division personnel will generally provide analytical support (either in-house or through contractor support) for all samples collected during the project. ENSV will subsequently review the analytical results for method precision and accuracy based on internal quality control measures and report analytical results to the specific activity leader(s). Whenever it is not feasible to submit samples to ENSV for analysis (e.g., excessive workload, equipment under repair, etc.), the contractor may (depending on the contract) procure the required analytical services through a subcontract, while ensuring that EPA-approved methodologies and procedures are followed.

1.5 Problem Definition/Background

The primary objective of this project is to gather information to meet specific needs of the pre-remedial and removal programs in a single activity to enable sound decisions to be made concerning future actions for the site. This project plan is intended to provide an overview of ISA activities performed in support of the Superfund program and to ensure the reliability of data generated from those activities.

This Quality Assurance Project Plan (QAPP) covers all activities associated with ISAs performed by the U.S. Environmental Protection Agency (EPA) Region VII Superfund Division (SUPR) and SUPR Contractors, pursuant to requirements directed by the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), P.L. 96-510 (as amended by the Superfund Amendments and Re-authorization Act [SARA] of 1986), and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The following are activities to be addressed pursuant to this QAPP:

- Pre-CERCLIS Screenings OSWER Directive #9200.4-05, September 30, 1996
- Preliminary Assessments (PA) EPA/540/G-91/013, September 1991
- Site Inspections (SI) EPA/540-R-92-021, September 1992
- Removal Assessments (RSE) (i.e., Removal Site Evaluations 40 CFR Part 300.410)
- Combined PA/SI
- Integrated PA/RSE
- Integrated SI/RSE

This QAPP is not intended to be utilized for the purpose of defining extent of contamination, or gathering sufficient data for developing clean-up cost estimates, or performing an Expanded Site Investigation (ESI). The ISA concept was first promoted as an initiative under the Superfund Accelerated Cleanup Model (SACM) as a means to expedite hazardous waste site investigations and clean-up actions. The strategy was to integrate the traditional removal and pre-remedial investigation processes to achieve the following goals:

- * Eliminate duplication of effort;
- * Expedite the site evaluation process by avoiding delays in implementing time-critical removal actions or other early response actions;
- * Minimize the number of site visits; and,
- * Collect only the data needed to assess the site appropriately.

Those goals may be attained by combining elements of removal assessments and pre-remedial assessments into a single ISA activity. As a result, the ISA will produce data that can be used to determine the need for a removal action, as well as for assessing the site's candidacy for inclusion on the National Priorities List (NPL).

By implementing ISA procedures, EPA may determine that a site does not need to be entered into the Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS) data base if no threats to human health or the environment are found. If no threats are identified for a site that is already in CERCLIS, the site may receive a designation of "no further response action planned" (NFRAP). Sites that are determined to warrant additional action may be subjected to any of the following response options:

- * Early actions (i.e., emergency removals, time-critical removals, etc.) to deal with immediate threats;
- * Enforcement actions (i.e., potentially responsible party [PRP] searches, information request letters, PRP-lead removals, etc.) to pursue enforcement-lead response actions;
- * Further site assessment and/or removal activities (i.e., expanded site inspections [ESIs], engineering evaluations/cost analyses [EE/CAs], non-time critical removals, etc.) required to adequately address the site.

1.6 Project Description

A flow chart of the ISA process is depicted in Figure 2. In general, an initial screening of the site will be performed to determine the site's eligibility for response under CERCLA, assess the need for emergency response activities, determine the potential for non-CERCLA response actions, and ascertain the need to obtain additional information pertaining to the site. A file search may also be performed to gather historical information related to the site. A site reconnaissance with limited sampling will typically follow, where waste characteristics/quantities, exposure pathways, potential targets, and NCP removal action criteria will be initially assessed. If only limited information on site contamination is known, samples are typically analyzed for the compounds contained in the Contract Laboratory Program (CLP) Target Analyte List (Attachment D). As information is obtained the analyte list will be tailored to the site. When environmental sampling is planned, a *Site Addendum for the Generic Integrated Site Assessment QAPP* (Attachment B), will be prepared. This form will be completed in accordance with EPA Region VII and national program guidance and will encompass the data quality objectives (DQOs) outlined in this QAPP, sampling network design, data collection procedures (including assessment of quality control parameters), special personnel and equipment requirements. The *Site Addendum for the Generic Integrated Site Assessment QAPP* (Attachment B) shall be reviewed by the Superfund Division's Quality Assurance Coordinator (QAC) prior to the start of field work. The specific data to be assessed/obtained during the site reconnaissance are summarized in Table 1 below.

An assessment of the site history, reconnaissance observations, and the analytical data will be performed by the EPA project manager to determine the appropriate course of action for the site. Both removal and pre-remedial criteria will be evaluated before the final decision is made.